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DOCKET NO. 49795
SOAH DOCKET NO. 473-20-1118

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COMPLAINT OF PETTY GROUP, LLP §
AGAINST RIO GRANDE ELECTRIC §
COOPERATIVE, INC. §

BEFORE THE
PUBLIC UTILITY COMMISSION
OF TEXAS

**RIO GRANDE ELECTRIC COOPERATIVE, INC.'S RESPONSES TO
PETTY GROUP, LLP'S FIFTH SET OF REQUESTS FOR INFORMATION**

TO: Petty Group, LLP, by and through their attorneys of record, Meghan Griffiths, Jennifer Ferri, Jackson Walker LLP, 1200 Congress Avenue, Suite 1100, Austin, Texas 78701.

COMES NOW, Rio Grande Electric Cooperative, Inc. ("RGEC"), by and through their attorneys of record, and files these responses to Petty Group, LLP's Fifth Set of Requests for Information. RGEC stipulates that these responses may be treated as if filed under oath.

Respectfully submitted,

Shea & Associates

By: /s/ Tammy Shea

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**ATTORNEYS FOR RIO GRANDE
ELECTRIC COOPERATIVE, INC.**

CERTIFICATE OF SERVICE

I hereby certify that a copy of this document will be served on all parties of record on March 6, 2020 in accordance with 16 TAC § 22.74.

/s/ Tammy Shea

Tammy Shea

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PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 5-1: Petty 5-1: Please provide the 2012 and 2019 Texas Reliability Entity ("TRE") audits of Rio Grande Electric Cooperative.

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Highly Sensitive Attachment 5.1

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
HIGHLY SENSITIVE UNDER THE PROTECTIVE ORDER ISSUED IN
THIS CASE.**

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 5-2: Please provide the average and peak demand for the Brundage feeder from 2010 to the present.

REQUESTED BY: Petty Group, LLP

RESPONSE:

See Confidential Attachment 5.2

**DOCUMENTS RESPONSIVE TO THIS REQUEST ARE CONSIDERED
CONFIDENTIAL UNDER THE PROTECTIVE ORDER ISSUED IN THIS
CASE.**

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 5-3: Please refer to the "Current" tab of Deposition Exhibit 34. Over what time period did the PMI recorder record data for the following entries? Please specify start date and time and end date and time.

- a. Petty Ranch Prior to Generator at 2:35 pm, Data Collection Date 3/6/2019
- b. Petty Ranch — Generator Data at 10:41 am, Data Collection Date 3/21/2019
- c. Petty Ranch — Generator Data at 12:16 pm, Data Collection Date 3/21/2019

REQUESTED BY: Petty Group, LLP

RESPONSE:

- a. Petty Ranch prior to generator at 2:35pm, data collection date 3/6/2019. PMI recorded data from 3/6/2019 starting at 2:28pm and ending at 3/8/2019 at 10:22am.
- b. Petty Ranch generator data at 10:41am, data collection date 3/21/2019. PMI recorded data from 3/19/2019 starting at 1:22pm and ending at 3/21/2019 at 1:40pm.
- c. Petty Ranch generator data at 12:16pm, data collection date 3/21/2019. PMI recorded data from 3/19/2019 starting at 1:22pm and ending at 3/21/2019 at 1:40pm.

SPONSOR:

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 5-4: Please refer to page 51 — 52 of the deposition transcript of Larry Powell. Please describe the upgrades to the Brundage substation and feeder performed on or around 2010 to serve industrial loads. In addition to the description of the upgrades, please provide the following:

- a. Cost of the upgrades;
- b. Whether the costs of the upgrades were paid for by individual oil and gas loads and, if so, (i) the name of the customer(s); (ii) the amounts paid by customer(s); and (iii) when the payments were made.

REQUESTED BY: Petty Group, LLP

RESPONSE:

Petty 5-4 Response

During the 4th quarter of 2010, RGEC was approached by [REDACTED]

[REDACTED] Based on this additional load service requirement and the system configuration of RGEC's existing substation and distribution lines in this area, the following system/facility upgrades were necessary and completed in order to provide the requested electric service:

- Upgrade RGEC Brundage substation from 3 MVA 69 kV-12.47/7.2 kV capacity and system voltage to 7.5/10.5 MVA 69 kV-24.9/14.4 kV capacity and system voltage.
- Upgrade system voltage and conductor capacity of 40.2 miles of existing 12.47/7.2 kV 3-phase Brundage Feeder 1 distribution line to higher capacity 24.9/14.4 kV 3-phase line operation.

- Add 2 new phases, upgrade system voltage and conductor capacity of 8.0 miles of 7.2 kV single-phase distribution line emanating from Brundage Feeder 1 to higher capacity 24.9/14.4 kV 3-phase line operation.
- Construct 2.5 miles of new 24.9/14.4 kV 3-phase distribution line from end of upgraded Brundage Feeder 1 line segment to requested point-of-service.

The total cost of above electrical system upgrades: [REDACTED]

Schedule of CIAC (contribution in aid of construction) funding:

<u>Entity/Customer/Member</u>	<u>Date of Payment</u>	<u>Amount of Payment</u>
[REDACTED]	December 5, 2010	[REDACTED]
[REDACTED]	May 6, 2011	[REDACTED]
[REDACTED]	May 6, 2011	[REDACTED]
	Sub-Total:	[REDACTED]
Rio Grande Electric Cooperative, Inc.	Allowance:	[REDACTED]
		[REDACTED]

INFORMATION CONTAINED IN THIS RFI RESPONSE IS CONFIDENTIAL PURSUANT TO PROTECTIVE ORDER IN DOCKET 49795

SPONSOR:

Roger Andrade

Roger Andrade

PUBLIC UTILITY COMMISSION OF TEXAS

**PUC NO. 49795
SOAH DOCKET NO. 473-20-1118**

COMPANY NAME: Rio Grande Electric Cooperative, Inc.

INFORMATION REQUESTED:

Petty 5-6 Please refer to the documents produced by RGEC titled “Updated Brundage Harmonics Location Summary 2-15-2019.xlsx” (the “February Harmonics Summary”) and “Updated Brundage Harmonics Location Summary 2-29-19.xlsx (the “August Harmonics Summary”). Under the “voltage” tab on each of these documents, please refer to column G, titled IEEE 519 VOLTAGE DISTORTION LIMIT THD%.” Please explain why the February Harmonics Summary reports a IEEE 529 voltage distortion limit of 8% for RGEC meters [REDACTED] (refer to lines 18 and 19) and [REDACTED] (refer to lines 20 and 21), while the later August Harmonics Summary reports an IEEE 519 voltage distortion limit of 5% for each of these meters (refer to lines 38 and 48).

REQUESTED BY: Petty Group, LLP

RESPONSE:

There was a data entry error on the early February summary report. The later report is the correct version.

Per IEEE519 Table 1-Voltage distortion limits bus voltage V at PCC ($V \leq 1.0\text{kV}$ individual harmonic 5.0% total harmonic distortion THD 8.0%) and ($1\text{kV} < V \leq 69\text{kV}$ individual harmonic 3.0% and total harmonic distortion THD 5.0%). Therefore, the limits RGEC is to utilize for primary metered sites (PME’s) will have different tolerances than secondary metered sites (SME’s).

SPONSOR:

Roger Andrade

